

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA §
v. § No. 4:19CR254
CRAIG BEASON § Judge Mazzant

ELEMENTS OF THE OFFENSE

The defendant, **Craig Beason**, is charged in Count One of the Information with violating 21 U.S.C. § 846, Conspiracy to Possess with Intent to Distribute Methamphetamine, and in Count Two with violating 18 U.S.C. § 1029(b)(2), Conspiracy to Commit Access Device Fraud. The essential elements which must be proven beyond a reasonable doubt in order to establish a violation of these sections are:

**Count One: 21 U.S.C. § 846, Conspiracy to Possess with Intent to Distribute
Methamphetamine**

First: That the defendant and one or more persons, directly or indirectly, reached an agreement to commit the crime charged in Count One of the Information, that is, to distribute or possess with intent to distribute Methamphetamine, a Schedule II controlled substance;

Second: That the defendant knew of the unlawful purpose of the agreement;
and

Third: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose.

Count Two: 18 U.S.C. § 1029(b)(2), Conspiracy to Commit Access Device Fraud

- First: That the defendant and one or more persons, directly or indirectly, reached an agreement to commit the crime charged in Count Two of the Information, that is, to commit access device fraud;
- Second: That the scope of the conspiracy involved at least fifteen counterfeit or unauthorized access devices, as defined in 18 U.S.C. 1029(e), and that the conspiracy intended to affect interstate or foreign commerce; and
- Third: That the defendant knew of the unlawful purpose of the agreement; and
- Fourth: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via CM-ECF electronic filing to defense counsel on June 19, 2020.

/s/ Anand Varadarajan
ANAND VARADARAJAN